

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Go Airlines (India) Limited,

Petitioner,

v.

International Aero Engines, LLC, a Delaware
Limited Liability Company,

Respondent.

Misc. Case No. 1:23-mc-00249-RGA-LDH

**STIPULATION AND [PROPOSED] ORDER FOR BRIEFING ON
RESPONDENT'S MOTION TO STAY PROCEEDINGS**

WHEREAS:

- A. On April 28, 2023, Petitioner Go Airlines (India) Limited (“GoFirst”) filed the Emergency Petition and Motion to Confirm Arbitration Awards (D.I. 2, the “Emergency Petition”) and related papers, including the Motion to Expedite Response and Proceedings related to the Petition (D.I. 1, the “Motion to Expedite”);
- B. On May 1, 2023, the Court granted the Motion to Expedite (D.I. 7), and respondent International Aero Engines, LLC’s (“IAE”) deadline to respond to the Emergency Petition was set to May 8, 2023, with GoFirst’s reply due May 11, 2023;
- C. On May 5, 2023, the Court granted IAE an additional three days to respond to the Emergency Petition (D.I. 14), with IAE’s response due on May 11, 2023 and GoFirst’s reply due on May 15, 2023;
- D. On May 10, 2023, the Court granted IAE’s Unopposed Motion to File Combined Brief in Opposition to the Emergency Petition and in Support of Respondent’s Motion to Stay Proceedings (the “Motion to Stay”) (D.I. 19);

E. On May 11, 2023, IAE filed a combined brief in opposition to the Emergency Petition and in support of the Motion to Stay (D.I. 24);

F. In the interest of efficiency, and in order to streamline the briefing on the motions in this case, GoFirst intends to file a combined brief not to exceed 20 pages in further support of the Emergency Petition and in opposition to the Motion to Stay on May 15, 2023;

G. The parties have agreed that IAE shall file its reply in further support of the Motion to Stay on May 19, 2023.

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties, subject to the approval of the Court, that:

1. GoFirst shall file a combined brief not to exceed 20 pages in further support of the Emergency Petition and in opposition to the Motion to Stay on May 15, 2023; and

2. IAE shall file its reply in further support of its Motion to Stay on May 19, 2023.

REED SMITH LLP

/s/ Brian M. Rostocki
Brian M. Rostocki (#4599)
Anne M. Steadman (#6221)
1201 Market Street, Suite 1500
Wilmington, DE 19801
(302) 778-7500
brostrocki@reedsmith.com
astezman@reedsmith.com

Attorneys for Respondent International Aero Engines, LLC

WILSON SONSINI GOODRICH
& ROSATI, P.C.

/s/ Kaitlin E. Maloney
Andrew D. Cordo (#4534)
Kaitlin E. Maloney (#6304)
222 Delaware Avenue, Suite 800
Wilmington, Delaware 19801
(302) 304-7600
acordo@wsgr.com
kmaloney@wsgr.com

Attorneys for Petitioner Go Airlines (India) Limited

Dated: May 15, 2023

It is SO ORDERED this _____ day of May, 2023.

Magistrate Judge Laura D. Hatcher